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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE PG&E CORPORATION, PACIFIC  
GAS AND ELECTRIC COMPANY,

Reorganized Debtors,

- ☐ Affects PG&E Corporation  
☒ Affects Pacific Gas and Electric Company  
☐ Affects both Debtors

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case)  
(Jointly Administered)

**CALIFORNIA PUBLIC EMPLOYEES' RETIREMENT SYSTEM'S OPPOSITION TO  
DEBTORS' OBJECTION TO CLAIM NO. 101607**

1 California Public Employees' Retirement System ("CalPERS") is a Securities Claimant that  
2 timely filed a proof of claim against Pacific Gas and Electric Company ("Pacific Gas & Electric")  
3 in accordance with the Extended Bar Date Order. Specifically, on April 16, 2020, CalPERS filed  
4 Claim No. 101607 against Pacific Gas & Electric.

5 In the Reorganized Debtors' Twenty-Sixth Securities Claims Omnibus Objection  
6 (Securities ADR No Liability Claims) (ECF No. 14001) (the "Objection"), filed on August 31,  
7 2023, the Debtors sought to disallow and expunge this claim on the ground that CalPERS had  
8 supposedly failed to respond to a settlement offer for this claim in accordance with the Court's  
9 Securities Procedures (as defined in the Objection).

10 However, the Debtors have acknowledged that the inclusion of Claim No. 101607 in the  
11 Objection was erroneous. Specifically, Debtors' counsel acknowledged in an email to CalPERS  
12 on October 5, 2023, that CalPERS actually did respond to the Debtors' settlement offer with a  
13 counteroffer, and Debtors counsel stated that "[w]e will withdraw our objection as to that  
14 claim . . . ." But the Debtors' Reply in Support of Twenty-Sixth Securities Claims Omnibus  
15 Objection (Securities ADR No Liability Claims) (ECF No. 14056), filed on October 10, 2023,  
16 argued in further support of the Objection without noting that the Debtors were withdrawing the  
17 Objection with respect to CalPERS' Claim No. 101607.

18 In response to a letter from CalPERS' counsel, the Debtors' counsel sent an email to  
19 CalPERS' counsel on October 13, 2023, stating in substance that they would notify the Court that  
20 the Debtors withdraw their objection to Claim No. 101607, but they have not yet done so.

21 On October 15, 2023, the Court entered an Order stating that in the absence of any  
22 opposition, the Court would grant the Objection at the hearing scheduled on October 17, 2023.  
23 Debtors' counsel confirmed by email today that the Debtors "will not seek to have the claim  
24 [no. 101607] expunged as part of the omnibus [objection]."

25 For the avoidance of doubt, CalPERS hereby opposes the Objection with respect to Claim  
26 No. 101607 on the ground that CalPERS responded to the Debtors' settlement offer in accordance  
27 with the Securities Procedures.  
28

1 Dated: October 16, 2023

Respectfully submitted,

2 **BERNSTEIN LITOWITZ BERGER**  
3 **& GROSSMANN LLP**

4 By: /s/ Jonathan D. Uslaner

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